

REMARKS/ARGUMENTS**1. Summary of the Office Action**

Claims 27-29, 31-35, 38-40 and 42-46 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,119,152 (Carlin et al) and "Domain Names - Concepts and Facilities" (RFC 1034).

2. Response to § 103 Rejections

Applicants respectfully traverse this rejection for the reasons set out below, and ask the Examiner for reconsideration.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

A. THERE IS NO SUGGESTION OR MOTIVATION TO COMBINE CARLIN AND RFC 1034

The Office Action states that a motivation to map each interface to a different domain can be found in Carlin's suggestion that "*it should appear* to the subscriber that he or she is connected to an online service that is administered by that service provider." Office Action mailed on 6/14/04, p. 3. The cited language in Carlin, however, reads as follows: "*As can be seen* from FIGS. 4-5, from the subscriber's standpoint, *it appears* that he is connected to a on-line service which is administered by the service provider."

Carlin, 8: 54-56. In fact, the desired appearance of an on-line service as being administered by the service provider has been achieved in Carlin by the use of provider specific service maps. Carlin, Figs. 4-5; col.7, ll. 50-67. Because Carlin discloses a solution to the problem of the appearance of an on-line service as being administered by the service provider, (i.e., the use of provider specific service maps), a person skilled in the art would not be motivated to seek a superfluous solution elsewhere. Thus, Carlin not only fails to provide a motivation to combine its disclosure with RFC 1034, but also teaches away from the invention of claim 27 by providing a solution, which is distinct altogether from "operating with the address of the first sales interface mapped to a first domain and the address of the second sales interface mapped to a second domain different from the first domain," as required by claim 27.

The motivation to combine Carlin and RFC 1034 is suggested solely by hindsight in view of the present "sales system for coupling to a communications network, comprising" a first sales interface at a first network address, the first sales interface including a first set of user interface elements; a second sales interface at a second network address, the second sales interface including a second set of user interface elements; and a sales server at a third network address that operates the first and second sales interfaces while providing an impression that they are being operated by different entities, wherein the sales server includes a customization interface responsive to user input to define the first and second sets of user interface elements, wherein the sales server is operative to create the impression that the sales interfaces are being operated by different domains by operating with the address of the first sales interface mapped to a first domain and the address of the second sales interface mapped to a second domain different from the first domain," i.e., the invention of claim 27. Accordingly, claim 27 and its dependent claims 28-29, and 31-34 are patentable and should be allowed.

Claims 35, 38, and 46 are rejected as obvious over Carlin in view if RFC 1034. Because, as discussed above, this combination is improper, claims 35, 38, and 46, as well as claims 39-40 and 42-45, dependent on claim 38, are patentable and should be allowed.

B. CARLIN AND RFC 1034 FAIL TO DISCLOSE EACH AND EVERY ELEMENT OF INDEPENDENT CLAIMS 27, 35, 38, AND 46, WHETHER CONSIDERED SINGULARLY OR IN COMBINATION

Claim 27 reads as follows:

A sales system for coupling to a communications network, comprising:

a first sales interface at a first network address, the first sales interface including a first set of user interface elements;

a second sales interface at a second network address, the second sales interface including a second set of user interface elements; and

a sales server at a third network address that operates the first and second sales interfaces while providing an impression that they are being operated by different entities, wherein the sales server includes a customization interface responsive to user input to define the first and second sets of user interface elements, wherein the sales server is operative to create the impression that the sales interfaces are being operated by different domains by operating with the address of the first sales interface mapped to a first domain and the address of the second sales interface mapped to a second domain different from the first domain, and wherein the first sales interface includes links to a first set of pages not operated by the sales server but being mapped to the first domain, and wherein the second sales interface includes links to a second set of pages not operated by the sales server but being mapped to the second domain.

The Office Action fails to discuss the element of claim 27 requiring that "the first sales interface includes links to a first set of pages not operated by the sales server but being mapped to the first domain" and "the second sales interface includes links to a second set of pages not operated by the sales server but being mapped to the second domain." It is submitted, that Carlin, RFC 1034, and a combination thereof fail to disclose or even suggest this element of claim 27. Therefore, claim 27 and its dependent claims, 28-29 and 31-34, are patentable and should be allowed.

Claims 35, 38, and 46 include some limitations that are similar to some limitations of claim 27. Therefore, claims 35, 38, and 46, as well as claims 39-40 and 42-45, dependent on claim 38, are patentable and should be allowed for at least the reasons articulated with respect to claim 27.

In light of the above, Applicants respectfully submit that the rejection under 35 U.S.C. § 103 has been overcome, and withdrawal of this rejection is therefore respectfully requested.

3. Claims 31-32 and 42-43 are not Addressed in the Office Action

The Office Action fails to address pending claims 31-32 and 42-43. Because claims 31-32 and 42-43 claims depend on allowable claims 27 and 35 respectively, these claims are patentable and should be allowed.

4. Conclusion

Having tendered the above remarks and amended the claims as indicated herein, Applicants respectfully submit that all rejections have been addressed and that the claims are now in a condition for allowance, which is earnestly solicited.

If there are any additional charges, please charge Deposit Account No. 02-2666.
If a telephone interview would in any way expedite the prosecution of the present application, the Examiner is invited to contact Elena B. Dreszer at (408) 947-8200 ext. 209.

Respectfully submitted,
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